

Kakalec & Schlanger, LLP

DEDICATED TO MARKETPLACE JUSTICE

February 16, 2016

VIA ECF

Judge Allyne R. Ross
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Park v. Santander Consumer USA, Inc., et al*,
Index: 15-CV-5374
Our File: 50015

Your Honor:

My firm represents Plaintiff in the above-referenced matter, as well as in seven of the other eight related matters.¹

Pursuant to Your Honor's bundling rule, Defendant Santander Consumer USA, Inc. ("SCUSA") was required to file all motion papers in connection with its pending motion to dismiss on February 15, 2016. See *Individual Practices, Rule III(A)* ("Filing of Motion Papers") (stating that moving party is to file all papers); *ECF Order dated 1/11/2016*. It appears, however, that SCUSA did not file a copy of Plaintiff's opposition to its motion and, instead, filed only its own motion and reply.

For this reason, Plaintiff filed its own opposition memorandum earlier this morning.

Plaintiff is also sending a marked courtesy copy to the Court under separate cover.

Respectfully,

/s/Daniel A. Schlanger

Daniel A. Schlanger

cc: R. Brenner, Esq.
P. Kakalec, Esq.

¹ Specifically, in addition to the Plaintiff herein, Kakalec & Schlanger, LLP represents the plaintiffs in Alkhatib v. NY Motor Group, et al. (13-CV-2337); Gabrys v. NY Motor Group, et al. (13-CV-7290); Freire v. NY Motor Group, et al. (13-CV-7291); Dong v. NY Motor Group, et al. (14-CV-2980); Chowdhury v. NY Motor Group, et al. (14-CV-2981); Ahmed v. Eltouby, et al. (15-CV-0284); and Banon v. M&T Bank, et al. (15-cv-4691), but not in Tuhin v. NY Motor Group, et al. (13-CV-5643).